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Attorney for Defendant **Trapero-Zazueta**

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(**HON. DANA M. SABRAW**)

UNITED STATES OF AMERICA, Plaintiff, v. **JESUS TRAPERO-ZAZUETA,** Defendant.	Criminal No. 07-CR-3415-DMS Date: January 25, 2008 Time: 11:00 a.m.. NOTICE OF MOTIONS AND MOTIONS TO: **1) COMPEL DISCOVERY;** **2) SUPPRESS EVIDENCE AND STATEMENTS;** **3) JOIN IN MOTIONS OF CO-COUNSEL; AND** **5) LEAVE TO FILE FURTHER MOTIONS**

TO: KAREN HEWITT, UNITED STATES ATTORNEY, and
PETER MAZZA, ASSISTANT UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that on Friday, January 25, 2008 at 11:00 a.m., or as soon thereafter as counsel may be heard, the defendant, Jesus Trapero-Zazueta, by and through his counsel, Sylvia Baiz hereby moves this Court to: (1) compel discovery; (2) suppress evidence and statements; (3) join in the motions of co-counsel; and (4) leave to file further motions.

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MOTIONS

The defendant, Jesus Trapero-Zazueta, by and through his counsel, Sylvia Baiz, and pursuant to Fed. R. Crim. P. 12, the Fourth Amendment, the Sixth Amendment, the Fourteenth Amendment, and all other applicable rules and statutes, hereby moves this Court to:

(1) compel discovery;

(2) suppress evidence and statements;

(3) leave to join in the motions of co-counsel; and

(4) leave to file further motions.

These motions are based upon the instant motions, the notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-entitled cause, and any and all other information that may be brought to the Court's attention prior to or during the hearing on these motions.

Respectfully submitted,

Dated: January 11, 2008

/S/ Sylvia Baiz
SYLVIA BAIZ
Attorney for Defendant Trapero-Zazueta